



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF EDUCATION

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### SNP Memo #2013-2014-03

TO: Directors, Supervisors, and Contact Persons Addressed

FROM: Catherine Digilio Grimes, MS, RD, LDN, SNS, *Catherine Digilio Grimes*  
Director, School Nutrition Programs

DATE: September 27, 2013

SUBJECT: Verification of Households' Eligibility for Free or Reduced Price Meals and  
Updates to Verification Worksheet Report for 2013-2014

Federal regulations governing the National School Lunch Program require school divisions to verify the eligibility of a sample of the total number of approved free and reduced price meal applications on file as of October 1, annually. This memorandum provides information for verification to be conducted this year and updates to the verification reporting process.

### Timelines – Annual

- October 1 - The number of approved applications on file on October 1 (excluding previous year's applications carried over into the current year) must be used to calculate the required "basic" or "standard" verification sample size.
- November 15 – Deadline for verification activities and processes to be completed.
- December 15 - Deadline for reporting the results of verification in SNPWeb.

### Forms

Virginia Department of Education (VDOE) prototype verification forms (i.e., SNP200-220), including the required Racial/Ethnic Data Report, are posted on SNPWeb in *Online Forms*. School divisions should use these prototypes, if possible. If the division elects to use alternate verification forms, from their eligibility software or other sources, those forms must be updated annually to reflect all current required information from the VDOE prototype forms.

### Sample Size and Method to Calculate

The required "basic" or "standard" sample size for verification is three percent of all approved applications on file as of October 1, or 3,000 applications, whichever is less. The law requires school divisions to draw the sample from error-prone applications. Error-prone applications are those that report total household income within \$100 monthly, or \$1,200 annually, of the income eligibility guidelines limit for free or reduced price meals for the applicable household size.

Currently, the 2013-2014 Verification Summary Worksheet (Worksheet) in SNPWeb has been disabled. The Worksheet is undergoing revisions to comply with new USDA verification reporting requirements.

To assist school divisions, an Excel tool has been designed to calculate the required sample size based on the number of approved applications on file as of October 1. School divisions enter the number of approved free and reduced price applications on file as of October 1 and the tool calculates the required number of applications to be verified and displays the result. School divisions should enter the data into the Excel tool on or immediately after October 1 to determine or confirm the number of applications to be verified to meet the required sample size. The *Verification Sample Calculator* is Attachment A.

Federal regulations specifically prohibit school divisions from verifying more than the required minimum sample size, with the exception of those applications verified for cause. If a household application selected to be verified as part of the original sample is subsequently determined to be withdrawn or otherwise ineligible prior to the completion of verification, the application must be replaced with a similar application to assure the required minimum sample size is met.

### **Verification Sample Confirmation Review**

Prior to conducting verification, school divisions are required to conduct a confirmation review of all applications selected for verification. The purpose of the review is to check the accuracy or confirm the initial free or reduced price eligibility determination. An individual other than the one who made the initial eligibility determination must conduct the confirmation review. Documentation of the confirmation review and any resulting changes in eligibility status must be maintained.

If the initial determination is found to be incorrect, the school division must correct the household eligibility status and notify the household of the change in eligibility through a notice of adverse action letter. A sample letter is included in the VDOE prototype verification forms. If the correction results in the application no longer being eligible for verification, it must be replaced by another eligible application (i.e., a correctly approved application within \$100 of the monthly eligibility limit). After completing the confirmation review, school divisions may replace up to five percent of the applications selected in the verification sample. Any application removed from the sample pursuant to this provision must be replaced with a similar application. School divisions must consider specific factors, such as communication difficulties and household stability, when declining to verify selected applications. Upon completing the confirmation review, the division should proceed with verification of applications with confirmed eligibility and those with corrected eligibility that remain eligible for benefits, as well as those selected to replace incorrectly determined applications.

### **Follow-up Activities**

Households selected for verification must be provided with a telephone number they may call for assistance. This phone number must be provided to the household in the notice of selection letter. Prototype letters can be found in SNPWeb. The phone number must permit the call to be free for all households in the division. The division may provide different phone numbers for each local calling area within the school division or they may establish a toll-free number for households outside of the local calling area. This letter must also include the name of a school official(s) to act as a point of contact for the household either to directly assist them or to refer the caller to a specific person for help.

A second follow-up is required for households that fail to respond to the initial request for verification information. At least one attempt, through mail, by telephone, or personal contact must be made. Written documentation of the required second notification, including all follow-up attempts and the results, must be maintained. If the household's eligibility status cannot be verified after the follow-up attempt(s), the household's benefits must be terminated through a notice of adverse action letter.

### **Reapplication**

After the initial verification process is completed on November 15, school divisions are encouraged, but no longer required, to track the number of households that were terminated as a result of verification and who reapply for benefits through February 15. Households that were terminated due to non-response to verification must provide documentation of their household income upon reapplication and this documentation and household size must be used to determine eligibility status. The number of households that reapply, and the results of reapplication, will no longer be reported in the Worksheet. All households terminated as a result of non-response to verification who reapply at any time during the school year they were selected for verification must meet all requirements of the verification process, including submission of documentation of all sources of household income.

### **Verification Reporting Updates**

As previously mentioned, the Verification Worksheet in SNPWeb has been disabled. While the Worksheet is being revised, users will not see the “Verification” tab in the blue line at the top of the main page of SNPWeb. When revisions are complete, access to the Verification tab will be restored to all users who previously had permission to view or modify the Worksheet.

To prepare for reporting the additional data elements in the new Worksheet, school divisions should be aware of the following changes:

- Students directly certified using SNAP case numbers provided by DOE/DSS, and other students in the household directly certified (DC) through extension of this SNAP DC, will be reported in one data field.
- Students directly certified by any other method, including TANF case number, homeless, migrant, runaway, foster, or Head Start, will be reported in a different data field as “Other DC.”
- School divisions must be able to track “other” DC separate from SNAP DC/extended SNAP DC in their eligibility database and be prepared to report these different types of DC separately in the Worksheet.
- Students who have been approved Free by any method, including household application and “Other DC,” and are later found to be DC by SNAP, should be reported as SNAP DC or extended SNAP DC.
- Additionally, for household applications approved by income, the total number of error-prone applications as of October 1 will be reported on the revised Worksheet.
- School divisions must be able to determine the number of income approved applications on file as of October 1 that reported total income within \$100 per month or \$1,200 per year of the income eligibility guidelines upper limit for household size for the category in which they were approved. For example, a household of 4 with a total monthly income of \$2,500 was approved for free meals. This approved application is considered error-prone because it is within \$100 of the limit for free meals for a household of 4, which is \$2,552.
- Other changes to the Worksheet do not require additional data collection, but will require a change in the way certain previously collected information is reported.
- Training on the revised Worksheet will be provided by DOE when the final version is available.

Detailed verification guidance can be found in the *USDA Eligibility Guidance Manual*, which was slightly revised in August 2013, *Part 8: Verification* <http://www.fns.usda.gov/sites/default/files/EliMan.pdf>.

If there are questions, please contact the school nutrition program specialist assigned to your division or Office of School Nutrition Programs staff at (804) 225-2074.

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